

# **EXHIBIT 2**

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

INTERNET SPORTS INTERNATIONAL,  
LTD., a foreign corporation;

Plaintiff,

vs.

AMELCO USA, LLC, a Delaware limited  
liability company; AMELCO UK LTD., a foreign  
corporation, and DOES I THROUGH X,  
INCLUSIVE; AND ROE CORPORATIONS I  
through X, inclusive,

Defendants.

CASE NO.: 2:23-CV-00893

**DEFENDANT AMELCO USA, LLC'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFF INTERNET SPORTS  
INTERNATIONAL, LTD'S  
AMENDED FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO AMELCO USA,  
LLC**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure ("FRCP"), and all other applicable laws and rules, as Amelco USA, LLC ("Defendant" or "AUSA"), by and through its undersigned counsel, submits the following objections and responses to Internet Sports International, LTD.'s ("ISI") Amended First Set of Requests for Production of Documents to Amelco USA, LLC ("Requests") dated October 20, 2023, as follows:

**GENERAL OBJECTIONS**

1. AUSA objects to each Request and each definition and instruction to the extent it seeks to impose upon AUSA any obligations or responsibilities other than those mandated by the Federal

1 Rules of Civil Procedure, the Local Rules of the United States District Court for the District of  
2 Nevada, or any other applicable law.

3 2. AUSA objects to each Request to the extent it is unduly burdensome, expensive, and  
4 not proportional to the needs of the case, considering the importance of the issues at stake in the  
5 action, the amount in controversy, the parties' relative access to relevant information, the parties'  
6 resources, the importance of discovery in resolving the issues, and that the burden or expense of the  
7 proposed discovery outweighs its likely benefit. See FRCP 26(b)(1).

8 3. AUSA objects to each Request to the extent it purports to compel production of  
9 documents or information that consist of trade secrets or other proprietary, confidential, research,  
10 development, or commercial information of AUSA not subject to disclosure under FRCP 26(c) or  
11 other applicable law.

12 4. AUSA objects to each Request to the extent it calls for documents protected by the  
13 attorney-client privilege, the attorney-work product doctrine, the protection accorded to materials  
14 prepared in anticipation of litigation, the common-interest privilege, the marital privilege, or any other  
15 applicable privilege, protection, immunity, or exemption from disclosure. Nothing contained in these  
16 objections is intended to be, or in any way may be, deemed a waiver of any such available privilege  
17 or immunity. Any inadvertent disclosure of information that is privileged or protected from discovery  
18 shall not constitute a waiver of any privilege or immunity.

19 5. AUSA objects to each Request to the extent it seeks documents or information which  
20 is either equally available, or more easily available, to ISI.

21 6. AUSA objects to the supplied definitions of "Amelco," "AUK," "AUSA," "you," and  
22 "your" as vague, ambiguous, unintelligible, and overbroad, and in that the definitions where  
23 incorporated could be interpreted to impose an undue burden on AUSA to provide information that  
24 is privileged, non-relevant, and/or outside of AUSA's control, and/or outside the scope of permissible  
25 discovery pursuant to FRCP 26. AUSA does not interpret that any request seeks production of  
26 privileged material. Further, AUSA responds to these requests on its own behalf and not on behalf  
27 of any other party or non-party to this litigation. In investigating, searching, and producing any  
28 document in response to these requests, AUSA has complied with its obligations to produce

1 documents that are within its possession, custody, or control as those terms are used in FRCP 34, and  
2 has neither assumed nor conceded any further duty or obligation beyond what the rule requires.

3 7. AUSA objects to the supplied definitions of “refer to / relating to / regarding /  
4 concerning” as vague, ambiguous, unintelligible, and/or overbroad, and in that to the definitions  
5 where incorporated could be interpreted to impose an undue burden on AUSA to provide information  
6 that is privileged, non-relevant, and/or outside of AUSA’s control, and/or outside the scope of  
7 permissible discovery pursuant to FRCP 26. For clarity, notwithstanding the foregoing objection,  
8 AUSA does not interpret that this request seeks such material.

9 8. AUSA objects to each definition which incorporates reference to specific sections of  
10 ISI’s Complaint, which would improperly appear to require AUSA to interpret ISI’s subjective intent  
11 in drafting its pleading and would improperly assume facts and impose an undue burden on AUSA.

12 9. AUSA objects to each Request to the extent it seeks information controlled or  
13 possessed by third parties not under AUSA’s control. To the extent the information requested is in  
14 the possession of a third party, it is more convenient, less burdensome and less expensive for ISI to  
15 seek discovery directly from that third party.

16 10. AUSA objects to each Request and each definition and instruction to the extent they  
17 purport to compel production of electronically stored information, documents, or materials from  
18 sources that are not reasonably accessible because of undue burden or costs, including, but not limited  
19 to, AUSA objects to each Request which purports to compel a burdensome or exhaustive search of  
20 AUSA’s case files for information, and to the extent each Request seeks information or documents  
21 relating to backup tapes, inactive e-mail accounts, voicemail, instant messaging, legacy data,  
22 metadata, and any type of inaccessible, residual, fragmented, or damaged data. See FRCP  
23 26(b)(2)(B) (“A party need not provide discovery of electronically stored information from sources  
24 that the party identifies as not reasonably accessible because of undue burden or cost.”).

25 11. AUSA reserves the right to object to further discovery regarding the subject matter of  
26 any Request and to object to the introduction into evidence of any and all information produced in  
27 response thereto.

28 12. By responding that it will produce all non-privileged documents in its possession,

1 custody, or control, AUSA does not concede that the documents specifically requested actually exist,  
2 or are properly discoverable or admissible.

3 13. As used herein, the term “privileged” refers to any and all documents and / or  
4 information protected by attorney-client privilege, the work product doctrine, or any other recognized  
5 privilege or basis for immunity from discovery. Accordingly, by responding that it will produce all  
6 “non-privileged” documents or information in its possession, custody, or control, AUSA does not  
7 agree to produce any such “privileged” documents or information.

8 14. While AUSA has undertaken a reasonable effort to provide responsive information to  
9 the extent such information is not subject to objection, AUSA’s investigation of this matter is  
10 ongoing. Accordingly, AUSA reserves its right to supplement, modify, amend, or revoke its  
11 responses to the Requests if it becomes known or appears at any time (i) that errors or omissions have  
12 been made or (ii) that additional or more accurate information becomes available.

13 15. AUSA objects to each Request to the extent it seeks information already within ISI’s  
14 knowledge, or which is more readily obtainable by ISI, or publicly-available information, or other  
15 information obtainable from some other source that is more convenient, less burdensome, or less  
16 expensive, or where such request will impose undue burden, inconvenience, or expense upon AUSA.

17 16. AUSA reserves all objections as to competency, relevance, materiality, privilege, or  
18 admissibility of all evidence proffered in any subsequent proceeding in, or trial of, this or any other  
19 action for any purpose whatsoever.

20 17. AUSA expects to discover additional facts in support of its allegations as discovery  
21 continues, and by responding to these Requests, AUSA does not waive its right to discovery and  
22 present in the future any and all other relevant facts and evidence.

23 18. AUSA objects to each Request to the extent documents may have existed but are  
24 unavailable to the extent the unavailability of such documents has been caused by ISI, or any other  
25 third party acting outside the control of AUSA.

26 19. AUSA objects to each Request to the extent it seeks a legal conclusion.

27 20. AUSA objects to each Request to the extent it assumes and/or mischaracterizes facts.

28 21. No incidental or implied admissions are intended herein. Nothing in these Objections

or Responses should be taken as an admission that: (a) AUSA accepts or admits the existence of any fact(s) set forth or assumed by the Requests; (b) documents or information responsive to any Request are in AUSA's possession, custody, or control; or (c) documents or information responsive to any Request exist. AUSA's responses to all or any part of a Request are also not intended to be, and shall not be, a waiver by AUSA of all or any part of any objection(s) to that Request.

22. These responses are based on AUSA's present knowledge, information, and belief. Because AUSA's discovery, investigation, and analysis is still ongoing, AUSA's Objections and Responses herein are made without prejudice to its right to assert additional objections and responses at a later date, or to correct, clarify, amend, or supplement its Objections and Responses as appropriate.

23. The applicable foregoing General Objections are incorporated into each of the specific Objections and Responses that follow. The stating of a specific Objection shall not be construed as a waiver of AUSA's General Objections.

### **SPECIFIC RESPONSES AND OBJECTIONS**

#### **REQUEST FOR PRODUCTION NO. 1:**

*All Documents and Communications wherein AUK identified itself or as AUSA or identified itself as Amelco, without distinguishing between AUK and AUSA.*

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

AUSA objects to this request as follows:

1. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in scope and time, irrespective of relevance to the claims in this matter.

2. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

3. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties. For

1 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
2 such material.

3 4. AUSA objects to this request to the extent it seeks material protected from  
4 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
5 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
6 does not interpret that this request seeks such material.

7 5. AUSA objects to this request as it is impermissibly vague to the extent it relies on  
8 the phrase “. . . AUK identified itself or as AUSA or identified or identified itself as Amelco . . .”  
9 which is susceptible to multiple overbroad interpretations and which renders this request  
10 unintelligible as drafted.

11 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
12 to this request.

13 **REQUEST FOR PRODUCTION NO. 2:**

14 *Documents sufficient to show all business conducted by AUSA in the United States*  
15 *generally and in the State of Nevada particularly. A complete response shall include Documents*  
16 *evidencing negotiations, agreements or contracts (whether executed or not), course of*  
17 *performance, and profits and losses.*

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

19 AUSA objects to this request as follows:

20 1. AUSA objects to this request on grounds that it appears to be propounded for no  
21 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
22 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
23 any way to its business dealings, which documents might reasonably include records regarding  
24 independently-developed proprietary technology, business plans and financial data, and third-  
25 party business relationships, the provision of which would impose an unfair and undue burden on  
26 AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation  
27 of material issues in this case. ISI has no colorable claim to any interest in or profits of any of  
28 AUSA's technology or business dealings with third parties, and therefore the facts and

1 circumstances of the same are utterly irrelevant.

2 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 phrase “sufficient to show all business conducted by AUSA in the United States generally and in  
4 the State of Nevada particularly,” which is susceptible to multiple interpretations and which  
5 renders this request overbroad, unduly burdensome, and unintelligible as drafted.

6 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
7 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
8 of relevance to the claims in this matter.

9 4. AUSA objects to this request as seeking material falling outside the scope of  
10 discovery under FRCP 26(b).

11 5. AUSA objects to this request on grounds that it appears to seek documents or  
12 information that consist of trade secrets or other proprietary, confidential, research, development,  
13 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
14 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
15 parties.

16 6. AUSA objects to this request to the extent it seeks material protected from  
17 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
18 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
19 does not interpret that this request seeks such material.

20 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
21 to this request.

22 **REQUEST FOR PRODUCTION NO. 3:**

23 *All Documents and Communications regarding ISI.*

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

25 AUSA objects to this request as follows:

26 1. AUSA objects to this request as overbroad and unduly burdensome in that it  
27 purports to compel production of a broad category of documents, unlimited in time and scope,  
28 irrespective of relevance to the claims in this matter.



2. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

3. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

5. AUSA objects to this request as it is impermissibly vague to the extent it relies on the phrase “. . . regarding ISI . . .” which is susceptible to multiple overbroad interpretations. AUSA responds to this request to the best of its ability based on its subjective understanding of the language used.

Subject to, and without waiving the foregoing general and specific objections, and to the extent AUSA is able to understand this request, AUSA states that it has produced or will produce non-privileged, responsive documents in its possession, custody, or control that are relevant to the claims at issue in this case as AUSA understands them and which are proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its response to this request as and when appropriate.

**REQUEST FOR PRODUCTION NO. 4:**

*All Documents and Communications regarding hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

AUSA objects to this request as follows:

1           1.       AUSA objects to this request on grounds that it appears to be propounded for no  
2       purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
3       purporting to compel AUSA to provide an essentially limitless category of documents relating in  
4       any way to gaming technology and/or AUSA's business affairs, which documents might  
5       reasonably include records regarding independently-developed proprietary technology, business  
6       plans and financial data, and third-party business relationships, the provision of which would  
7       impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
8       outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
9       claim to any interest in or profits of any of AUSA's technology or business dealings with third  
10      parties, and therefore the facts and circumstances of the same are utterly irrelevant.

11          2.       AUSA objects to this request as vague and ambiguous to the extent it relies on the  
12      phrase "regarding hardware or software for a retail gaming or gambling kiosk or other retail  
13      gaming or gambling solution," which is susceptible to multiple interpretations and which renders  
14      this request overbroad, unduly burdensome, and unintelligible as drafted.

15          3.       AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
16      it purports to compel production of a broad category of documents, unlimited in time, irrespective  
17      of relevance to the claims in this matter.

18          4.       AUSA objects to this request as seeking material falling outside the scope of  
19      discovery under FRCP 26(b).

20          5.       AUSA objects to this request on grounds that it appears to seek documents or  
21      information that consist of trade secrets or other proprietary, confidential, research, development,  
22      or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
23      applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
24      parties.

25          6.       AUSA objects to this request to the extent it seeks material protected from  
26      disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
27      and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
28      does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 5:**

*All Documents and Communications exchanged between AUSA and ISI regarding the development of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

AUSA objects to this request as follows:

1. AUSA objects to this request as the information sought is equally available to propounding party and therefore appears to be propounded for the improper purpose of harassing AUSA, causing unnecessary delay, and needlessly increasing the cost of litigation.

2. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “development of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution,” which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted. AUSA responds to this request to the best of its ability based on its subjective understanding of the language used.

Subject to, and without waiving the foregoing general and specific objections, and to the extent AUSA is able to understand this request, AUSA states that it has produced or will produce non-privileged, responsive documents in its possession, custody, or control that are relevant to the claims at issue in this case as AUSA understands them and which are proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its response to this request as and when appropriate.

**REQUEST FOR PRODUCTION NO. 6:**

*All Documents and Communications exchanged between AUSA and any third party regarding the development, marketing, or sale of hardware or software for a retail gaming or*

1 *gambling kiosk or other retail gaming or gambling solution in the US market.*

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

3 AUSA objects to this request as follows:

4 1. AUSA objects to this request on grounds that it appears to be propounded for no  
5 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
6 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
7 any way to gaming technology and/or AUSA's business affairs, which documents might  
8 reasonably include records regarding independently-developed proprietary technology, business  
9 plans and financial data, and third-party business relationships, the provision of which would  
10 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
11 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
12 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
13 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

14 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
15 phrase "development, marketing, or sale of hardware or software for a retail gaming or gambling  
16 kiosk or other retail gaming or gambling solution," which is susceptible to multiple interpretations  
17 and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

18 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
19 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
20 of relevance to the claims in this matter.

21 4. AUSA objects to this request as seeking material falling outside the scope of  
22 discovery under FRCP 26(b).

23 5. AUSA objects to this request on grounds that it appears to seek documents or  
24 information that consist of trade secrets or other proprietary, confidential, research, development,  
25 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
26 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
27 parties.

28 6. AUSA objects to this request to the extent it seeks material protected from

1 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
2 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
3 does not interpret that this request seeks such material.

4 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
5 to this request.

6 **REQUEST FOR PRODUCTION NO. 7:**

7 *All Documents and Communications exchanged internally by AUSA regarding the*  
8 *development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or*  
9 *other retail gaming or gambling solution in the US market.*

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

11 AUSA objects to this request as follows:

12 1. AUSA objects to this request on grounds that it appears to be propounded for no  
13 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
14 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
15 any way to gaming technology and/or AUSA's business affairs, which documents might  
16 reasonably include records regarding independently-developed proprietary technology, business  
17 plans and financial data, and third-party business relationships, the provision of which would  
18 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
19 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
20 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
21 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

22 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
23 phrase "development, marketing, or sale of hardware or software for a retail gaming or gambling  
24 kiosk or other retail gaming or gambling solution," which is susceptible to multiple interpretations  
25 and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

26 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
27 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
28 of relevance to the claims in this matter.

4. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

5. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

6. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 8:**

*All Documents and Communications exchanged between Rob Bone and ISI regarding the development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

AUSA objects to this request as follows:

1. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

2. AUSA objects to this request as the information sought is equally available to propounding party and therefore appears to be propounded for the improper purpose of harassing AUSA, causing unnecessary delay, and needlessly increasing the cost of litigation.

3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution,” which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted. AUSA responds to this request to the best of its ability based on its subjective understanding of the language used.

5. AUSA objects to this request to the extent it seeks documents that are outside its possession, custody, and control and which are more appropriately sought from other parties to this case, or from non-parties.

Subject to the foregoing specific and general objections, to the extent AUSA is able to understand this request, and without conceding the existence of any fact or legal conclusion, AUSA states that the documents sought by this request appear to already be in the possession of ISI.

**REQUEST FOR PRODUCTION NO. 9:**

*All Documents and Communications exchanged between Rob Bone and AUSA regarding ISI and/or the development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA’s business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA’s technology or business dealings with third



1 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 phrases “regarding ISI” and “development, marketing, or sale of hardware or software for a retail  
4 gaming or gambling kiosk or other retail gaming or gambling solution,” which are susceptible to  
5 multiple interpretations and which render this request overbroad, unduly burdensome, and  
6 unintelligible as drafted.

7 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
8 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
9 of relevance to the claims in this matter.

10 4. AUSA objects to this request as seeking material falling outside the scope of  
11 discovery under FRCP 26(b).

12 5. AUSA objects to this request on grounds that it appears to seek documents or  
13 information that consist of trade secrets or other proprietary, confidential, research, development,  
14 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
15 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
16 parties.

17 6. AUSA objects to this request to the extent it seeks material protected from  
18 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
19 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
20 does not interpret that this request seeks such material.

21 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
22 to this request.

23 **REQUEST FOR PRODUCTION NO. 10:**

24 *All Documents and Communications exchanged between AUSA and any third party*  
25 *regarding ISI and/or the development, marketing, or sale hardware or software for a retail gaming*  
26 *or gambling kiosk or other retail gaming or gambling solution in the US market.*

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

28 AUSA objects to this request as follows:



1           1.       AUSA objects to this request on grounds that it appears to be propounded for no  
2       purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
3       purporting to compel AUSA to provide an essentially limitless category of documents relating in  
4       any way to gaming technology and/or AUSA's business affairs, which documents might  
5       reasonably include records regarding independently-developed proprietary technology, business  
6       plans and financial data, and third-party business relationships, the provision of which would  
7       impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
8       outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
9       claim to any interest in or profits of any of AUSA's technology or business dealings with third  
10      parties, and therefore the facts and circumstances of the same are utterly irrelevant.

11          2.       AUSA objects to this request as vague and ambiguous to the extent it relies on the  
12      phrases "regarding ISI" and "development, marketing, or sale of hardware or software for a retail  
13      gaming or gambling kiosk or other retail gaming or gambling solution," which are susceptible to  
14      multiple interpretations and which render this request overbroad, unduly burdensome, and  
15      unintelligible as drafted.

16          3.       AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
17      it purports to compel production of a broad category of documents, unlimited in time, irrespective  
18      of relevance to the claims in this matter.

19          4.       AUSA objects to this request as seeking material falling outside the scope of  
20      discovery under FRCP 26(b).

21          5.       AUSA objects to this request on grounds that it appears to seek documents or  
22      information that consist of trade secrets or other proprietary, confidential, research, development,  
23      or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
24      applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
25      parties.

26          6.       AUSA objects to this request to the extent it seeks material protected from  
27      disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
28      and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA

1 does not interpret that this request seeks such material.

2 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
3 to this request.

4 **REQUEST FOR PRODUCTION NO. 11:**

5 *All Documents or Communications authored or received by Rob Bone regarding ISI and/or*  
6 *developing hardware or software for a retail gaming or gambling kiosk or other retail gaming or*  
7 *gambling solution in the US market.*

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

9 AUSA objects to this request as follows:

10 1. AUSA objects to this request on grounds that it appears to be propounded for no  
11 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
12 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
13 any way to gaming technology and/or AUSA's business affairs, which documents might  
14 reasonably include records regarding independently-developed proprietary technology, business  
15 plans and financial data, and third-party business relationships, the provision of which would  
16 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
17 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
18 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
19 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

20 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
21 phrases "regarding ISI" and "developing hardware or software for a retail gaming or gambling  
22 kiosk or other retail gaming or gambling solution," which are susceptible to multiple  
23 interpretations and which render this request overbroad, unduly burdensome, and unintelligible as  
24 drafted.

25 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
26 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
27 of relevance to the claims in this matter.

28 4. AUSA objects to this request as seeking material falling outside the scope of

1 discovery under FRCP 26(b).

2 5. AUSA objects to this request on grounds that it appears to seek documents or  
3 information that consist of trade secrets or other proprietary, confidential, research, development,  
4 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
5 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
6 parties.

7 6. AUSA objects to this request to the extent it seeks material protected from  
8 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
9 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
10 does not interpret that this request seeks such material.

11 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
12 to this request.

13 **REQUEST FOR PRODUCTION NO. 12:**

14 *All Documents and Communications exchanged between Paul Manning and ISI.*

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

16 AUSA objects to this request as follows:

17 1. AUSA objects to this request as overbroad and unduly burdensome in that it  
18 purports to compel production of a broad category of documents, unlimited in time and scope,  
19 irrespective of relevance to the claims in this matter.

20 2. AUSA objects to this request as seeking material falling outside the scope of  
21 discovery under FRCP 26(b).

22 3. AUSA objects to this request as the information sought is equally available to  
23 propounding party and therefore appears to be propounded for the improper purpose of harassing  
24 AUSA, causing unnecessary delay, and needlessly increasing the cost of litigation.

25 4. AUSA objects to this request to the extent it seeks documents that are outside its  
26 possession, custody, and control and which are more appropriately sought from other parties to  
27 this case, or from non-parties.

28 Subject to the foregoing specific and general objections, to the extent AUSA is able to

1 understand this request, and without conceding the existence of any fact or legal conclusion,  
2 AUSA states that the documents sought by this request appear to already be in the possession of  
3 ISI, and/or are more appropriately sought from persons or entities other than AUSA.

4 **REQUEST FOR PRODUCTION NO. 13:**

5 *All Documents and Communications exchanged between Paul Manning and AUSA or*  
6 *AUSA relating ISI and/or the development, marketing, or sale of hardware or software for a retail*  
7 *gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

9 AUSA objects to this request as follows:

10 1. AUSA objects to this request on grounds that it appears to be propounded for no  
11 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
12 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
13 any way to gaming technology and/or AUSA's business affairs, which documents might  
14 reasonably include records regarding independently-developed proprietary technology, business  
15 plans and financial data, and third-party business relationships, the provision of which would  
16 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
17 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
18 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
19 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

20 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
21 phrases "relating ISI" and "development, marketing, or sale of hardware or software for a retail  
22 gaming or gambling kiosk or other retail gaming or gambling solution," which are susceptible to  
23 multiple interpretations and which render this request overbroad, unduly burdensome, and  
24 unintelligible as drafted.

25 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
26 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
27 of relevance to the claims in this matter.

28 4. AUSA objects to this request as seeking material falling outside the scope of

discovery under FRCP 26(b).

5. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

6. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 14:**

*All Documents and Communications exchanged between Paul Manning and any third party relating to ISI and/or the development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrases “relating to ISI” and “development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution,” which are susceptible to multiple interpretations and which render this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

4. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

5. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

6. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

7. AUSA objects to this request to the extent it seeks documents that are outside its possession, custody, and control.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 15:**

*Any draft communications authored or received by Paul Manning regarding ISI and/or the development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

1 AUSA objects to this request as follows:

2 1. AUSA objects to this request on grounds that it appears to be propounded for no  
3 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
4 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
5 any way to gaming technology and/or AUSA's business affairs, which documents might  
6 reasonably include records regarding independently-developed proprietary technology, business  
7 plans and financial data, and third-party business relationships, the provision of which would  
8 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
9 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
10 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
11 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

12 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
13 phrases "regarding ISI" and "development, marketing, or sale of hardware or software for a retail  
14 gaming or gambling kiosk or other retail gaming or gambling solution," which are susceptible to  
15 multiple interpretations and which render this request overbroad, unduly burdensome, and  
16 unintelligible as drafted.

17 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
18 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
19 of relevance to the claims in this matter.

20 4. AUSA objects to this request as seeking material falling outside the scope of  
21 discovery under FRCP 26(b).

22 5. AUSA objects to this request on grounds that it appears to seek documents or  
23 information that consist of trade secrets or other proprietary, confidential, research, development,  
24 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
25 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
26 parties.

27 6. AUSA objects to this request to the extent it seeks material protected from  
28 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,

1 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
2 does not interpret that this request seeks such material.

3 7. AUSA objects to this request to the extent it seeks documents that are outside its  
4 possession, custody, and control.

5 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
6 to this request.

7 **REQUEST FOR PRODUCTION NO. 16:**

8 *All Documents and Communications exchanged between Leon Wynne and ISI.*

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16**

10 AUSA objects to this request as follows:

11 1. AUSA objects to this request as overbroad and unduly burdensome in that it  
12 purports to compel production of a broad category of documents, unlimited in time and scope,  
13 irrespective of relevance to the claims in this matter.

14 2. AUSA objects to this request as seeking material falling outside the scope of  
15 discovery under FRCP 26(b).

16 3. AUSA objects to this request as the information sought is equally available to  
17 propounding party and therefore appears to be propounded for the improper purpose of harassing  
18 AUSA, causing unnecessary delay, and needlessly increasing the cost of litigation.

19 4. AUSA objects to this request to the extent it seeks documents that are outside its  
20 possession, custody, and control.

21 Subject to the foregoing specific and general objections, to the extent AUSA is able to  
22 understand this request, and without conceding the existence of any fact or legal conclusion,  
23 AUSA states that the documents sought by this request appear to already be in the possession of  
24 ISI, and/or are more appropriately sought from persons or entities other than AUSA.

25 **REQUEST FOR PRODUCTION NO. 17:**

26 *All Documents and Communications exchanged between Leon Wynne and AUSA relating*  
27 *to ISI and/or the development, marketing, or sale of hardware or software for a retail gaming or*  
28 *gambling kiosk or other retail gaming or gambling solution in the US market.*



1     **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

2     AUSA objects to this request as follows:

3             1.     AUSA objects to this request on grounds that it appears to be propounded for no  
4     purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
5     purporting to compel AUSA to provide an essentially limitless category of documents relating in  
6     any way to gaming technology and/or AUSA's business affairs, which documents might  
7     reasonably include records regarding independently-developed proprietary technology, business  
8     plans and financial data, and third-party business relationships, the provision of which would  
9     impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
10    outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
11    claim to any interest in or profits of any of AUSA's technology or business dealings with third  
12    parties, and therefore the facts and circumstances of the same are utterly irrelevant.

13            2.     AUSA objects to this request as vague and ambiguous to the extent it relies on the  
14    phrases "relating to ISI" and "development, marketing, or sale of hardware or software for a retail  
15    gaming or gambling kiosk or other retail gaming or gambling solution," which are susceptible to  
16    multiple interpretations and which render this request overbroad, unduly burdensome, and  
17    unintelligible as drafted.

18            3.     AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
19    it purports to compel production of a broad category of documents, unlimited in time, irrespective  
20    of relevance to the claims in this matter.

21            4.     AUSA objects to this request as seeking material falling outside the scope of  
22    discovery under FRCP 26(b).

23            5.     AUSA objects to this request on grounds that it appears to seek documents or  
24    information that consist of trade secrets or other proprietary, confidential, research, development,  
25    or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
26    applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
27    parties.

28            6.     AUSA objects to this request to the extent it seeks material protected from

disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

7. AUSA objects to this request to the extent it seeks documents that are outside its possession, custody, and control.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 18:**

*All Documents and Communications exchanged between Leon Wynne and any third party relating to ISI and/or the development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrases "relating to ISI" and "development, marketing, or sale of hardware or software for a retail gaming or gambling kiosk or other retail gaming or gambling solution," which are susceptible to multiple interpretations and which render this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

4. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

5. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

6. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

7. AUSA objects to this request to the extent it seeks documents that are outside its possession, custody, and control.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

#### **REQUEST FOR PRODUCTION NO. 19:**

*All drafts and/or copies of the License Agreement, including visible edits.*

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

AUSA objects to this request as follows:

1. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

2. AUSA objects to this request to the extent it seeks documents already in the possession, custody, or control of ISI.

3. AUSA objects to this request to the extent it assumes and/or mischaracterizes facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “visible edits,” which is susceptible to multiple interpretations. AUSA responds to this request to the best of its ability based on its subjective understanding of the language used. Additionally, AUSA does not assume or concede any obligation to produce electronically stored information that exceeds the requirements of the Federal Rules of Civil Procedure.

Subject to, and without waiving the foregoing general and specific objections, and to the extent AUSA is able to understand this request, AUSA states that it has produced or will produce non-privileged (and non-work product), responsive documents in its possession, custody, or control that are relevant to the claims at issue in this case as AUSA understands them and which are proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its response to this request as and when appropriate.

**REQUEST FOR PRODUCTION NO. 20:**

*All Documents and Communications concerning the 2019 NDA.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

AUSA objects to this request as follows:

1. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

2. AUSA objects to this request to the extent it seeks documents already in the possession, custody, or control of ISI.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “concerning the 2019 NDA,” which is susceptible to multiple overbroad interpretations and which renders this request unduly burdensome. AUSA responds to this request to the best of its ability based on its subjective understanding of the language used.

Subject to, and without waiving the foregoing general and specific objections, and to the

1 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
 2 non-privileged (and non-work product), responsive documents in its possession, custody, or control  
 3 that are relevant to the claims at issue in this case as AUSA understands them and which are  
 4 proportional to the needs of the case. Discovery and AUSA's investigation of the claims and  
 5 defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its  
 6 response to this request as and when appropriate.

7 **REQUEST FOR PRODUCTION NO. 21:**

8 *All drafts and/or copies of the 2019 MCA, including visible edits.*

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

10 AUSA objects to this request as follows:

11 1. AUSA objects to this request to the extent it seeks material protected from  
 12 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
 13 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
 14 does not interpret that this request seeks such material.

15 2. AUSA objects to this request to the extent it seeks documents already in the  
 16 possession, custody, or control of ISI.

17 3. AUSA objects to this request to the extent it assumes and/or mischaracterizes facts.

18 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 19 phrase "visible edits," which is susceptible to multiple interpretations. AUSA responds to this  
 20 request to the best of its ability based on its subjective understanding of the language used.  
 21 Additionally, AUSA does not assume or concede any obligation to produce electronically stored  
 22 information that exceeds the requirements of the Federal Rules of Civil Procedure.

23 Subject to, and without waiving the foregoing general and specific objections, and to the  
 24 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
 25 non-privileged (and non-work product), responsive documents in its possession, custody, or control  
 26 that are relevant to the claims at issue in this case as AUSA understands them and which are  
 27 proportional to the needs of the case. Discovery and AUSA's investigation of the claims and  
 28 defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its

1 response to this request as and when appropriate.

2 **REQUEST FOR PRODUCTION NO. 22:**

3 *All Documents and Communications concerning the 2019 MCA.*

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

5 AUSA objects to this request as follows:

6 1. AUSA objects to this request to the extent it seeks material protected from  
7 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
8 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
9 does not interpret that this request seeks such material.

10 2. AUSA objects to this request to the extent it seeks documents already in the  
11 possession, custody, or control of ISI.

12 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
13 phrase “concerning the 2019 NDA,” which is susceptible to multiple overbroad interpretations and  
14 which renders this request unduly burdensome. AUSA responds to this request to the best of its  
15 ability based on its subjective understanding of the language used.

16 Subject to, and without waiving the foregoing general and specific objections, and to the  
17 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
18 non-privileged (and non-work product), responsive documents in its possession, custody, or control  
19 that are relevant to the claims at issue in this case as AUSA understands them and which are  
20 proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and  
21 defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its  
22 response to this request as and when appropriate.

23 **REQUEST FOR PRODUCTION NO. 23:**

24 *All drafts and/or copies of the Kiosk Agreement, including visible edits.*

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

26 AUSA objects to this request as follows:

27 1. AUSA objects to this request to the extent it seeks material protected from  
28 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,

1 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
2 does not interpret that this request seeks such material.

3 2. AUSA objects to this request to the extent it seeks documents already in the  
4 possession, custody, or control of ISI.

5 3. AUSA objects to this request to the extent it assumes and/or mischaracterizes facts.

6 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
7 phrase “Kiosk Agreement,” which assumes and mischaracterizes facts and which is susceptible to  
8 multiple interpretations. AUSA responds to this request to the best of its ability based on its  
9 subjective understanding of the language used.

10 5. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
11 phrase “visible edits,” which is susceptible to multiple interpretations. AUSA responds to this  
12 request to the best of its ability based on its subjective understanding of the language used.  
13 Additionally, AUSA does not assume or concede any obligation to produce electronically stored  
14 information that exceeds the requirements of the Federal Rules of Civil Procedure.

15 Subject to, and without waiving the foregoing general and specific objections, and to the  
16 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
17 non-privileged (and non-work product), responsive documents in its possession, custody, or control  
18 that are relevant to the claims at issue in this case as AUSA understands them and which are  
19 proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and  
20 defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its  
21 response to this request as and when appropriate.

22 **REQUEST FOR PRODUCTION NO. 24:**

23 *All Documents and Communications concerning the Kiosk Agreement.*

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

25 AUSA objects to this request as follows:

26 1. AUSA objects to this request to the extent it seeks material protected from  
27 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
28 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA

1 does not interpret that this request seeks such material.

2 2. AUSA objects to this request to the extent it seeks documents already in the  
3 possession, custody, or control of ISI.

4 3. AUSA objects to this request to the extent it assumes and/or mischaracterizes facts.

5 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
6 phrase “Kiosk Agreement,” which assumes and mischaracterizes facts and which is susceptible to  
7 multiple interpretations. AUSA responds to this request to the best of its ability based on its  
8 subjective understanding of the language used.

9 5. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
10 phrase “concerning the Kiosk Agreement,” which is susceptible to multiple overbroad  
11 interpretations and which renders this request unduly burdensome. AUSA responds to this request  
12 to the best of its ability based on its subjective understanding of the language used.

13 Subject to, and without waiving the foregoing general and specific objections, and to the  
14 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
15 non-privileged (and non-work product), responsive documents in its possession, custody, or control  
16 that are relevant to the claims at issue in this case as AUSA understands them and which are  
17 proportional to the needs of the case. Discovery and AUSA’s investigation of the claims and  
18 defenses in this matter are ongoing and AUSA reserves the right to supplement or amend its  
19 response to this request as and when appropriate.

20 **REQUEST FOR PRODUCTION NO. 25:**

21 *All Documents and Communications regarding the Kiosk Co-Development Project.*

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

23 AUSA objects to this request as follows:

24 1. AUSA objects to this request to the extent it assumes and/or mischaracterizes facts.

25 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
26 phrase “Kiosk Co-Development Project,” which assumes and mischaracterizes facts and which is  
27 susceptible to multiple interpretations, and which renders this request unintelligible as drafted.

28 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the



1 phrase “concerning the Kiosk Co-Development Project Agreement,” which is susceptible to  
 2 multiple overbroad interpretations and which renders this request unduly burdensome and  
 3 unintelligible as drafted.

4 4. AUSA objects to this request to the extent it seeks material protected from  
 5 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
 6 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
 7 does not interpret that this request seeks such material.

8 5. AUSA objects to this request to the extent it seeks documents or information that  
 9 consist of trade secrets or other proprietary, confidential, research, development, or commercial  
 10 information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable  
 11 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
 12 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
 13 such material.

14 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
 15 to this request.

16 **REQUEST FOR PRODUCTION NO. 26:**

17 *All Documents and Communications concerning any offer from ISI to develop, market, or*  
 18 *sell hardware or software for a retail gaming or gambling kiosk or other retail gaming or*  
 19 *gambling solution in the US market.*

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

21 AUSA objects to this request as follows:

22 1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
 23 facts.

24 2. AUSA objects to this request on grounds that it appears to be duplicative and  
 25 cumulative, in whole or in part, of other requests, and thereby imposes an undue burden on AUSA  
 26 in demanding a response.

27 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 28 phrase “concerning any offer from ISI to develop, market, or sell hardware or software for a retail

gaming or gambling kiosk or other retail gaming or gambling solution in the US market,” which is susceptible to multiple overbroad interpretations and which renders this request unduly burdensome and unintelligible as drafted.

4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

5. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, to the extent Defendant is able to understand this request, and without conceding the existence of any fact or legal conclusion, AUSA refers to and incorporates its responses to Request Number 3 and Request Number 5.

**REQUEST FOR PRODUCTION NO. 27:**

*All Documents and Communications concerning any request for payment or payment arrangement between AUSA and ISI.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “concerning any request for payment or payment arrangement between AUSA and ISI,” which is susceptible to multiple overbroad interpretations and which renders this request unduly burdensome and unintelligible as drafted.

3. AUSA objects to this request to the extent it seeks material protected from

disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, AUSA requests that ISI clarify what is being sought by this request.

**REQUEST FOR PRODUCTION NO. 28:**

*All Documents and Communications reflecting payment(s) made by you to ISI.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.
2. AUSA objects to this request on grounds that it appears to seek documents already in the possession, custody, or control of ISI.
3. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “reflecting payments made by you to ISI,” which is susceptible to multiple overbroad interpretations and which renders this request unduly burdensome and unintelligible as drafted.
4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.
5. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, AUSA requests that ISI clarify what is being sought by this request.

**REQUEST FOR PRODUCTION NO. 29:**

*Documents sufficient to show every sale or license of Amelco software or hardware related to a retail gambling or gaming solution within United States, from January 1, 2019 to the present.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to show every sale or license of Amelco software or hardware related to a retail gambling or gaming solution," which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term "Amelco," which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

4. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, irrespective of relevance to the claims in this matter.

5. AUSA objects to this request as seeking material falling outside the scope of

1 discovery under FRCP 26(b).

2 6. AUSA objects to this request on grounds that it appears to seek documents or  
3 information that consist of trade secrets or other proprietary, confidential, research, development,  
4 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
5 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
6 parties.

7 7. AUSA objects to this request to the extent it seeks material protected from  
8 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
9 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
10 does not interpret that this request seeks such material.

11 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
12 to this request.

13 **REQUEST FOR PRODUCTION NO. 30:**

14 *Documents sufficient to show every sale or license of Amelco software or hardware related*  
15 *to a retail gambling or gaming solution within United States, prior to January 1, 2019.*

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

17 AUSA objects to this request as follows:

18 1. AUSA objects to this request on grounds that it appears to be propounded for no  
19 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
20 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
21 any way to gaming technology and/or AUSA's business affairs, which documents might  
22 reasonably include records regarding independently-developed proprietary technology, business  
23 plans and financial data, and third-party business relationships, the provision of which would  
24 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
25 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
26 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
27 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

28 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the

1 phrase “sufficient to show every sale or license of Amelco software or hardware related to a retail  
2 gambling or gaming solution,” which is susceptible to multiple interpretations and which renders  
3 this request overbroad, unduly burdensome, and unintelligible as drafted.

4 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
5 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
6 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
7 on information within its possession, custody, and control under FRCP 34, and does not purport  
8 to respond on behalf of any other party or non-party to this litigation.

9 4. AUSA objects to this request on grounds that the supplied time period has no  
10 connection to the time period during which the facts at issue in this case occurred.

11 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
12 it purports to compel production of a broad category of documents, irrespective of relevance to the  
13 claims in this matter.

14 6. AUSA objects to this request as seeking material falling outside the scope of  
15 discovery under FRCP 26(b).

16 7. AUSA objects to this request on grounds that it appears to seek documents or  
17 information that consist of trade secrets or other proprietary, confidential, research, development,  
18 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
19 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
20 parties.

21 8. AUSA objects to this request to the extent it seeks material protected from  
22 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
23 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
24 does not interpret that this request seeks such material.

25 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
26 to this request.

27 **REQUEST FOR PRODUCTION NO. 31:**

28 *Documents sufficient to describe the technical function and operation of the hardware or*

1 *software related to a retail gambling or gaming solution sold by Amelco in the United States, from*  
2 *January 1, 2019 to the present.*

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

4 AUSA objects to this request as follows:

5 1. AUSA objects to this request on grounds that it appears to be propounded for no  
6 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
7 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
8 any way to gaming technology and/or AUSA's business affairs, which documents might  
9 reasonably include records regarding independently-developed proprietary technology, business  
10 plans and financial data, and third-party business relationships, the provision of which would  
11 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
12 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
13 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
14 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

15 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
16 phrase "sufficient to describe the technical function and operation of the hardware or software  
17 related to a retail gambling or gaming solution sold by Amelco," which is susceptible to multiple  
18 interpretations and which renders this request overbroad, unduly burdensome, and unintelligible  
19 as drafted.

20 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
21 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
22 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
23 on information within its possession, custody, and control under FRCP 34, and does not purport  
24 to respond on behalf of any other party or non-party to this litigation.

25 4. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
26 it purports to compel production of a broad category of documents, irrespective of relevance to the  
27 claims in this matter.

28 5. AUSA objects to this request as seeking material falling outside the scope of

1 discovery under FRCP 26(b).

2 6. AUSA objects to this request on grounds that it appears to seek documents or  
3 information that consist of trade secrets or other proprietary, confidential, research, development,  
4 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
5 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
6 parties.

7 7. AUSA objects to this request to the extent it seeks material protected from  
8 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
9 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
10 does not interpret that this request seeks such material.

11 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
12 to this request.

13 **REQUEST FOR PRODUCTION NO. 32:**

14 *Documents sufficient to describe the technical function and operation of the hardware or*  
15 *software related to a retail gambling or gaming solution sold by Amelco in the United States, prior*  
16 *to January 1, 2019.*

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

18 AUSA objects to this request as follows:

19 1. AUSA objects to this request on grounds that it appears to be propounded for no  
20 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
21 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
22 any way to gaming technology and/or AUSA's business affairs, which documents might  
23 reasonably include records regarding independently-developed proprietary technology, business  
24 plans and financial data, and third-party business relationships, the provision of which would  
25 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
26 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
27 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
28 parties, and therefore the facts and circumstances of the same are utterly irrelevant.



1           2.       AUSA objects to this request as vague and ambiguous to the extent it relies on the  
2 phrase “sufficient to describe the technical function and operation of the hardware or software  
3 related to a retail gambling or gaming solution sold by Amelco,” which is susceptible to multiple  
4 interpretations and which renders this request overbroad, unduly burdensome, and unintelligible  
5 as drafted.

6           3.       AUSA objects to this request as vague and ambiguous to the extent it relies on the  
7 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
8 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
9 on information within its possession, custody, and control under FRCP 34, and does not purport  
10 to respond on behalf of any other party or non-party to this litigation.

11          4.       AUSA objects to this request on grounds that the supplied time period has no  
12 connection to the time period during which the facts at issue in this case occurred.

13          5.       AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
14 it purports to compel production of a broad category of documents, irrespective of relevance to the  
15 claims in this matter.

16          6.       AUSA objects to this request as seeking material falling outside the scope of  
17 discovery under FRCP 26(b).

18          7.       AUSA objects to this request on grounds that it appears to seek documents or  
19 information that consist of trade secrets or other proprietary, confidential, research, development,  
20 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
21 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
22 parties.

23          8.       AUSA objects to this request to the extent it seeks material protected from  
24 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
25 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
26 does not interpret that this request seeks such material.

27               Based on the foregoing specific and general objections, AUSA has no obligation to respond  
28 to this request.

**REQUEST FOR PRODUCTION NO. 33:**

*Documents sufficient to show all marketing, sales, or licensing of hardware or software by Amelco to Fanatics.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to show all marketing, sales, or licensing of hardware or software by Amelco," which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term "Amelco," which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, irrespective of time period or

1 relevance to the claims in this matter.

2 6. AUSA objects to this request as seeking material falling outside the scope of  
3 discovery under FRCP 26(b).

4 7. AUSA objects to this request on grounds that it appears to seek documents or  
5 information that consist of trade secrets or other proprietary, confidential, research, development,  
6 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
7 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
8 parties.

9 8. AUSA objects to this request to the extent it seeks material protected from  
10 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
11 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
12 does not interpret that this request seeks such material.

13 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
14 to this request.

15 **REQUEST FOR PRODUCTION NO. 34:**

16 *Documents sufficient to describe the technical function and operation of all hardware or*  
17 *software marketed, sold, or licensed by Amelco to Fanatics.*

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

19 AUSA objects to this request as follows:

20 1. AUSA objects to this request on grounds that it appears to be propounded for no  
21 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
22 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
23 any way to gaming technology and/or AUSA's business affairs, which documents might  
24 reasonably include records regarding independently-developed proprietary technology, business  
25 plans and financial data, and third-party business relationships, the provision of which would  
26 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
27 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
28 claim to any interest in or profits of any of AUSA's technology or business dealings with third

1 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 phrase “sufficient to describe the technical function and operation of all hardware or software  
4 marketed, sold, or licensed by Amelco,” which is susceptible to multiple interpretations and which  
5 renders this request overbroad, unduly burdensome, and unintelligible as drafted.

6 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
7 facts.

8 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
9 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
10 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
11 on information within its possession, custody, and control under FRCP 34, and does not purport  
12 to respond on behalf of any other party or non-party to this litigation.

13 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
14 it purports to compel production of a broad category of documents, irrespective of time period or  
15 relevance to the claims in this matter.

16 6. AUSA objects to this request as seeking material falling outside the scope of  
17 discovery under FRCP 26(b).

18 7. AUSA objects to this request on grounds that it appears to seek documents or  
19 information that consist of trade secrets or other proprietary, confidential, research, development,  
20 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
21 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
22 parties.

23 8. AUSA objects to this request to the extent it seeks material protected from  
24 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
25 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
26 does not interpret that this request seeks such material.

27 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
28 to this request.

**REQUEST FOR PRODUCTION NO. 35:**

*Documents sufficient to describe the development of all hardware or software marketed, sold, or licensed by Amelco to Fanatics, from February 2019 to the present.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to describe the development of all hardware or software marketed, sold, or licensed by Amelco to Fanatics," which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term "Amelco," which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, irrespective of relevance to the

1 claims in this matter.

2 6. AUSA objects to this request as seeking material falling outside the scope of  
3 discovery under FRCP 26(b).

4 7. AUSA objects to this request on grounds that it appears to seek documents or  
5 information that consist of trade secrets or other proprietary, confidential, research, development,  
6 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
7 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
8 parties.

9 8. AUSA objects to this request to the extent it seeks material protected from  
10 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
11 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
12 does not interpret that this request seeks such material.

13 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
14 to this request.

15 **REQUEST FOR PRODUCTION NO. 36:**

16 *Documents sufficient to show all marketing, sales, or licensing of hardware or software by*  
17 *Amelco to Hard Rock and/or the Seminole Tribe.*

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

19 AUSA objects to this request as follows:

20 1. AUSA objects to this request on grounds that it appears to be propounded for no  
21 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
22 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
23 any way to gaming technology and/or AUSA's business affairs, which documents might  
24 reasonably include records regarding independently-developed proprietary technology, business  
25 plans and financial data, and third-party business relationships, the provision of which would  
26 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
27 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
28 claim to any interest in or profits of any of AUSA's technology or business dealings with third

1 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 phrase “sufficient to show all marketing, sales, or licensing of hardware or software by Amelco to  
4 Hard Rock and/or the Seminole Tribe,” which is susceptible to multiple interpretations and which  
5 renders this request overbroad, unduly burdensome, and unintelligible as drafted.

6 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
7 facts.

8 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
9 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
10 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
11 on information within its possession, custody, and control under FRCP 34, and does not purport  
12 to respond on behalf of any other party or non-party to this litigation.

13 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
14 it purports to compel production of a broad category of documents, irrespective of time period or  
15 relevance to the claims in this matter.

16 6. AUSA objects to this request as seeking material falling outside the scope of  
17 discovery under FRCP 26(b).

18 7. AUSA objects to this request on grounds that it appears to seek documents or  
19 information that consist of trade secrets or other proprietary, confidential, research, development,  
20 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
21 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
22 parties.

23 8. AUSA objects to this request to the extent it seeks material protected from  
24 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
25 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
26 does not interpret that this request seeks such material.

27 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
28 to this request.

**REQUEST FOR PRODUCTION NO. 37:**

*Documents sufficient to describe the technical function and operation of all hardware or software marketed, sold, or licensed by Amelco to Hard Rock and/or the Seminole Tribe.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to describe the technical function and operation of all hardware or software marketed, sold, or licensed by Amelco," which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term "Amelco," which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, irrespective of time period or



1 relevance to the claims in this matter.

2 6. AUSA objects to this request as seeking material falling outside the scope of  
3 discovery under FRCP 26(b).

4 7. AUSA objects to this request on grounds that it appears to seek documents or  
5 information that consist of trade secrets or other proprietary, confidential, research, development,  
6 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
7 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
8 parties.

9 8. AUSA objects to this request to the extent it seeks material protected from  
10 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
11 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
12 does not interpret that this request seeks such material.

13 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
14 to this request.

15 **REQUEST FOR PRODUCTION NO. 38:**

16 *Documents sufficient to describe the development of all hardware or software marketed,*  
17 *sold, or licensed Amelco to Hard Rock and/or the Seminole Tribe.*

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

19 AUSA objects to this request as follows:

20 1. AUSA objects to this request on grounds that it appears to be propounded for no  
21 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
22 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
23 any way to gaming technology and/or AUSA's business affairs, which documents might  
24 reasonably include records regarding independently-developed proprietary technology, business  
25 plans and financial data, and third-party business relationships, the provision of which would  
26 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
27 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
28 claim to any interest in or profits of any of AUSA's technology or business dealings with third

1 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 phrase “sufficient to describe the development of all hardware or software marketed, sold, or  
4 licensed Amelco to Hard Rock and/or Seminole Tribe,” which is susceptible to multiple  
5 interpretations and which renders this request overbroad, unduly burdensome, and unintelligible  
6 as drafted.

7 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
8 facts.

9 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
10 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
11 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
12 on information within its possession, custody, and control under FRCP 34, and does not purport  
13 to respond on behalf of any other party or non-party to this litigation.

14 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
15 it purports to compel production of a broad category of documents, irrespective of time period or  
16 relevance to the claims in this matter.

17 6. AUSA objects to this request as seeking material falling outside the scope of  
18 discovery under FRCP 26(b).

19 7. AUSA objects to this request on grounds that it appears to seek documents or  
20 information that consist of trade secrets or other proprietary, confidential, research, development,  
21 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
22 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
23 parties.

24 8. AUSA objects to this request to the extent it seeks material protected from  
25 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
26 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
27 does not interpret that this request seeks such material.

28 Based on the foregoing specific and general objections, AUSA has no obligation to respond

1 to this request.

2 **REQUEST FOR PRODUCTION NO. 39:**

3 *All JIRA tickets or other similar Documents concerning the development of hardware or*  
 4 *software related to any Amelco retail gambling or gaming solution developed for or offered for*  
 5 *sale in the United States, including without limitation JIRA tickets exchanged between Amelco and*  
 6 *ISI.*

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

8 AUSA objects to this request as follows:

9 1. AUSA objects to this request on grounds that it appears to be propounded for no  
 10 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
 11 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
 12 any way to gaming technology and/or AUSA's business affairs, which documents might  
 13 reasonably include records regarding independently-developed proprietary technology, business  
 14 plans and financial data, and third-party business relationships, the provision of which would  
 15 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
 16 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
 17 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
 18 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

19 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 20 phrases "JIRA ticket or other similar Documents" and "concerning the development of hardware  
 21 or software related to any Amelco retail gambling or gaming solution developed for or offered for  
 22 sale," which are susceptible to multiple interpretations and which render this request overbroad,  
 23 unduly burdensome, and unintelligible as drafted.

24 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
 25 facts.

26 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 27 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
 28 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based

on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

6. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

7. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

8. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 40:**

*All marketing and sales materials regarding hardware or software related to any Amelco retail gambling or gaming solution developed for or offered for sale in the United States.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business

1 plans and financial data, and third-party business relationships, the provision of which would  
2 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
3 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
4 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
5 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

6 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
7 phrases "JIRA ticket or other similar Documents" and "concerning the development of hardware  
8 or software related to any Amelco retail gambling or gaming solution developed for or offered for  
9 sale," which are susceptible to multiple interpretations and which render this request overbroad,  
10 unduly burdensome, and unintelligible as drafted.

11 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
12 facts.

13 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
14 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
15 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
16 on information within its possession, custody, and control under FRCP 34, and does not purport  
17 to respond on behalf of any other party or non-party to this litigation.

18 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
19 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
20 of relevance to the claims in this matter.

21 6. AUSA objects to this request as seeking material falling outside the scope of  
22 discovery under FRCP 26(b).

23 7. AUSA objects to this request on grounds that it appears to seek documents or  
24 information that consist of trade secrets or other proprietary, confidential, research, development,  
25 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
26 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
27 parties.

28 8. AUSA objects to this request to the extent it seeks material protected from

1 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
 2 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
 3 does not interpret that this request seeks such material.

4 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
 5 to this request.

6 **REQUEST FOR PRODUCTION NO. 41:**

7 *All Documents and Communications exchanged with customers or potential customers*  
 8 *regarding hardware or software related to any Amelco retail gambling or gaming solution*  
 9 *developed for or offered for sale in the United States, from February 2019 to the present.*

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

11 AUSA objects to this request as follows:

12 1. AUSA objects to this request on grounds that it appears to be propounded for no  
 13 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
 14 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
 15 any way to gaming technology and/or AUSA's business affairs, which documents might  
 16 reasonably include records regarding independently-developed proprietary technology, business  
 17 plans and financial data, and third-party business relationships, the provision of which would  
 18 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
 19 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
 20 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
 21 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

22 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 23 phrases "customers or potential customers" and "regarding hardware or software related to any  
 24 Amelco retail gambling or gaming solution developed for or offere for sale," which are susceptible  
 25 to multiple interpretations and which render this request overbroad, unduly burdensome, and  
 26 unintelligible as drafted.

27 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
 28 facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term “Amelco,” which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, irrespective of relevance to the claims in this matter.

6. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

7. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

8. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

#### **REQUEST FOR PRODUCTION NO. 42:**

*All Documents and Communications regarding the shipping of kiosks between you and ISI.*

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

2. AUSA objects to this request to the extent it seeks documents already in the

possession, custody, or control of ISI.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “regarding the shipping of kiosks between you and ISI” which assumes and mischaracterizes facts and is susceptible to multiple interpretations, rendering this request overbroad and unintelligible as drafted.

4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, AUSA requests that ISI clarify what is being sought by this request.

**REQUEST FOR PRODUCTION NO. 43:**

*Documents sufficient to show the current location and condition of any hardware of software shipped by ISI to AUSA.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

2. AUSA objects to this request to the extent it seeks documents already in the possession, custody, or control of ISI.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “sufficient to show the current location and condition of any hardware or software shipped by ISI” which assumes and mischaracterizes facts and is susceptible to multiple interpretations, rendering this request overbroad and unintelligible as drafted.

4. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties. For



1 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
2 such material.

3 Subject to the foregoing specific and general objections, AUSA requests that ISI clarify  
4 what is being sought by this request.

5 **REQUEST FOR PRODUCTION NO. 44:**

6 *All Documents and Communications concerning the use by AUSA of any hardware of*  
7 *software shipped by ISI to AUSA.*

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

9 AUSA objects to this request as follows:

10 1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
11 facts.

12 2. AUSA objects to this request to the extent it seeks documents already in the  
13 possession, custody, or control of ISI.

14 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
15 phrase “concerning the use by AUSA of any hardware of software shipped by ISI to AUSA” which  
16 assumes and mischaracterizes facts and is susceptible to multiple interpretations, rendering this  
17 request overbroad and unintelligible as drafted.

18 4. AUSA objects to this request to the extent it seeks documents or information that  
19 consist of trade secrets or other proprietary, confidential, research, development, or commercial  
20 information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable  
21 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
22 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
23 such material.

24 Subject to the foregoing specific and general objections, AUSA requests that ISI clarify  
25 what is being sought by this request.

26 **REQUEST FOR PRODUCTION NO. 45:**

27 *All Documents and Communications between you and the team of Amelco service*  
28 *providers sent to Las Vegas in or around May of 2019.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “team of Amelco service providers sent to Las Vegas in or around May of 2019,” which assumes and mischaracterizes facts and is susceptible to multiple interpretations, rendering this request overbroad and unintelligible as drafted.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term “Amelco,” which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, AUSA requests that ISI clarify what is being sought by this request.

**REQUEST FOR PRODUCTION NO. 46:**

*All Documents and Communications regarding the team of service Amelco providers sent to Las Vegas in or around May of 2019.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it assumes and/or mischaracterizes facts.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “regarding the team of Amelco service providers sent to Las Vegas in or around May of

2019,” which assumes and mischaracterizes facts and is susceptible to multiple interpretations, rendering this request overbroad and unintelligible as drafted.

3. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term “Amelco,” which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

4. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Subject to the foregoing specific and general objections, AUSA requests that ISI clarify what is being sought by this request.

**REQUEST FOR PRODUCTION NO. 47:**

*All Documents and Communications regarding the management of AUSA.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

AUSA objects to this request as follows:

1. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “regarding the management of AUSA,” which is susceptible to multiple interpretations, rendering this request overbroad and unintelligible as drafted.

2. AUSA objects to this request as overbroad and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

3. AUSA objects to this request on grounds that it is more appropriately directed to AUSA.

4. AUSA objects to this request to the extent it seeks documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable

1 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
 2 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
 3 such material.

4 5. AUSA objects to this request to the extent it seeks material protected from  
 5 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
 6 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
 7 does not interpret that this request seeks such material.

8 Subject to the foregoing specific and general objections, AUSA requests that ISI clarify  
 9 what is being sought by this request.

10 **REQUEST FOR PRODUCTION NO. 48:**

11 *All Documents and Communications between AUSA and Robert Miller regarding the*  
 12 *management of AUSA.*

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

14 AUSA objects to this request as follows:

15 1. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 16 phrase “regarding the management of AUSA,” which is susceptible to multiple interpretations,  
 17 rendering this request overbroad and unintelligible as drafted.

18 2. AUSA objects to this request as overbroad and unduly burdensome in that it  
 19 purports to compel production of a broad category of documents, unlimited in time, irrespective  
 20 of relevance to the claims in this matter.

21 3. AUSA objects to this request on grounds that it is more appropriately directed to  
 22 AUSA.

23 4. AUSA objects to this request to the extent it seeks documents or information that  
 24 consist of trade secrets or other proprietary, confidential, research, development, or commercial  
 25 information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable  
 26 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
 27 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
 28 such material.

1           5.     AUSA objects to this request to the extent it seeks material protected from  
2 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
3 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
4 does not interpret that this request seeks such material.

5           Based on the foregoing specific and general objections, AUSA has no obligation to respond  
6 to this request.

7     **REQUEST FOR PRODUCTION NO. 49:**

8           *All Documents and Communications between AUSA and Damian Walton regarding the*  
9 *management of AUSA.*

10    **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

11    AUSA objects to this request as follows:

12           1.     AUSA objects to this request as vague and ambiguous to the extent it relies on the  
13 phrase “regarding the management of AUSA,” which is susceptible to multiple interpretations,  
14 rendering this request overbroad and unintelligible as drafted.

15           2.     AUSA objects to this request as overbroad and unduly burdensome in that it  
16 purports to compel production of a broad category of documents, unlimited in time, irrespective  
17 of relevance to the claims in this matter.

18           3.     AUSA objects to this request on grounds that it is more appropriately directed to  
19 AUSA.

20           4.     AUSA objects to this request to the extent it seeks documents or information that  
21 consist of trade secrets or other proprietary, confidential, research, development, or commercial  
22 information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable  
23 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
24 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
25 such material.

26           5.     AUSA objects to this request to the extent it seeks material protected from  
27 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
28 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA

1 does not interpret that this request seeks such material.

2 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
3 to this request.

4 **REQUEST FOR PRODUCTION NO. 50:**

5 *Documents sufficient to describe the development of the SSBT, including without limitation*  
6 *the commencement of such development, any major changes or improvements made to the SSBT,*  
7 *and any SSBT Hardware or Software actually marketed, sold, licensed, or offered for sale or*  
8 *license to Amelco customers.*

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

10 AUSA objects to this request as follows:

11 1. AUSA objects to this request on grounds that it appears to be propounded for no  
12 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
13 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
14 any way to gaming technology and/or AUSA's business affairs, which documents might  
15 reasonably include records regarding independently-developed proprietary technology, business  
16 plans and financial data, and third-party business relationships, the provision of which would  
17 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
18 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
19 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
20 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

21 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
22 phrases "sufficient to describe the development of the SSBT," "commencement of such  
23 development," "any major changes or improvements made to the SSBT," and "any SSBT  
24 Hardware or Software actually marketed, sold, licensed, or offered for sale to Amelco customers,"  
25 which are susceptible to multiple interpretations and which render this request overbroad, unduly  
26 burdensome, and unintelligible as drafted.

27 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
28 facts.

4. AUSA objects to this request as vague and ambiguous to the extent it relies on the defined term “Amelco,” which is susceptible to multiple interpretations and which renders this request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based on information within its possession, custody, and control under FRCP 34, and does not purport to respond on behalf of any other party or non-party to this litigation.

5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

6. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

7. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

8. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

AUSA objects to this request on grounds that it appears to be duplicative of Request Number 50. AUSA refers to and incorporates its objection and response to Request Number 50.

**REQUEST FOR PRODUCTION NO. 51:**

*All documents concerning Amelco’s contention that it “independently” developed the SSBT without reference to information provided by ISI.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by

1 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
2 any way to gaming technology and/or AUSA's business affairs, which documents might  
3 reasonably include records regarding independently-developed proprietary technology, business  
4 plans and financial data, and third-party business relationships, the provision of which would  
5 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
6 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
7 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
8 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

9 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
10 phrase "concerning Amelco's contention that it independently developed the SSBT" which is  
11 susceptible to multiple interpretations and which renders this request overbroad, unduly  
12 burdensome, and unintelligible as drafted.

13 3. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
14 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
15 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
16 on information within its possession, custody, and control under FRCP 34, and does not purport  
17 to respond on behalf of any other party or non-party to this litigation.

18 4. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
19 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
20 of relevance to the claims in this matter.

21 5. AUSA objects to this request as seeking material falling outside the scope of  
22 discovery under FRCP 26(b).

23 6. AUSA objects to this request on grounds that it appears to seek documents or  
24 information that consist of trade secrets or other proprietary, confidential, research, development,  
25 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
26 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
27 parties.

28 7. AUSA objects to this request to the extent it seeks material protected from



disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 52:**

*Documents sufficient to describe the development of the SSBT, including without limitation the commencement of such development, any major changes or improvements made to the SSBT, and any SSBT hardware or software actually marketed, sold, licensed, or offered for sale or license to Amelco customers.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to describe the technical operation and function of the SSBT" which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective

1 of relevance to the claims in this matter.

2 4. AUSA objects to this request as seeking material falling outside the scope of  
3 discovery under FRCP 26(b).

4 5. AUSA objects to this request on grounds that it appears to seek documents or  
5 information that consist of trade secrets or other proprietary, confidential, research, development,  
6 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
7 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
8 parties.

9 6. AUSA objects to this request to the extent it seeks material protected from  
10 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
11 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
12 does not interpret that this request seeks such material.

13 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
14 to this request.

15 **REQUEST FOR PRODUCTION NO. 53:**

16 *Documents sufficient to describe the technical operation and function of the SSBT.*

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

18 AUSA objects to this request as follows:

19 1. AUSA objects to this request on grounds that it appears to be propounded for no  
20 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
21 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
22 any way to gaming technology and/or AUSA's business affairs, which documents might  
23 reasonably include records regarding independently-developed proprietary technology, business  
24 plans and financial data, and third-party business relationships, the provision of which would  
25 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
26 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
27 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
28 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase “sufficient to describe the technical operation and function of the SSBT” which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that it purports to compel production of a broad category of documents, unlimited in time, irrespective of relevance to the claims in this matter.

4. AUSA objects to this request as seeking material falling outside the scope of discovery under FRCP 26(b).

5. AUSA objects to this request on grounds that it appears to seek documents or information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

6. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 54:**

*Documents sufficient to describe all sales of hardware or software related to the SSBT in the U.S.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in

1 any way to gaming technology and/or AUSA's business affairs, which documents might  
2 reasonably include records regarding independently-developed proprietary technology, business  
3 plans and financial data, and third-party business relationships, the provision of which would  
4 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
5 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
6 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
7 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

8 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
9 phrase "sufficient to describe all sales of hardware or software related to the SSBT in the U.S."  
10 which is susceptible to multiple interpretations and which renders this request overbroad, unduly  
11 burdensome, and unintelligible as drafted.

12 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
13 facts.

14 4. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
15 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
16 of relevance to the claims in this matter.

17 5. AUSA objects to this request as seeking material falling outside the scope of  
18 discovery under FRCP 26(b).

19 6. AUSA objects to this request on grounds that it appears to seek documents or  
20 information that consist of trade secrets or other proprietary, confidential, research, development,  
21 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
22 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
23 parties.

24 7. AUSA objects to this request to the extent it seeks material protected from  
25 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
26 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
27 does not interpret that this request seeks such material.

28 Based on the foregoing specific and general objections, AUSA has no obligation to respond

1 to this request.

2 **REQUEST FOR PRODUCTION NO. 55:**

3 *Documents sufficient to describe all sales of hardware or software related to the SSBT*  
 4 *outside of the U.S.*

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

6 AUSA objects to this request as follows:

7 1. AUSA objects to this request on grounds that it appears to be propounded for no  
 8 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
 9 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
 10 any way to gaming technology and/or AUSA's business affairs, which documents might  
 11 reasonably include records regarding independently-developed proprietary technology, business  
 12 plans and financial data, and third-party business relationships, the provision of which would  
 13 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
 14 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
 15 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
 16 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

17 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
 18 phrase "sufficient to describe all sales of hardware or software related to the SSBT outside the  
 19 U.S." which is susceptible to multiple interpretations and which renders this request overbroad,  
 20 unduly burdensome, and unintelligible as drafted.

21 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
 22 facts.

23 4. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
 24 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
 25 of relevance to the claims in this matter.

26 5. AUSA objects to this request as seeking material falling outside the scope of  
 27 discovery under FRCP 26(b).

28 6. AUSA objects to this request on grounds that it appears to seek documents or

information that consist of trade secrets or other proprietary, confidential, research, development, or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable law, and/or which is prohibited from disclosure by contractual obligations to third parties.

7. AUSA objects to this request to the extent it seeks material protected from disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 56:**

*Documents sufficient to identify all persons involved in the development of hardware or software related to the SSBT.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to identify all persons involved in the development of hardware or software related to the SSBT" which is susceptible to multiple interpretations and which renders this request

1 overbroad, unduly burdensome, and unintelligible as drafted.

2 3. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
3 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
4 of relevance to the claims in this matter.

5 4. AUSA objects to this request as seeking material falling outside the scope of  
6 discovery under FRCP 26(b).

7 5. AUSA objects to this request on grounds that it appears to seek documents or  
8 information that consist of trade secrets or other proprietary, confidential, research, development,  
9 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
10 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
11 parties.

12 6. AUSA objects to this request to the extent it seeks material protected from  
13 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
14 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
15 does not interpret that this request seeks such material.

16 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
17 to this request.

18 **REQUEST FOR PRODUCTION NO. 57:**

19 *Documents sufficient to identify all Amelco customers that have purchased or licensed*  
20 *hardware or software related to the SSBT.*

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

22 AUSA objects to this request as follows:

23 1. AUSA objects to this request on grounds that it appears to be propounded for no  
24 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
25 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
26 any way to gaming technology and/or AUSA's business affairs, which documents might  
27 reasonably include records regarding independently-developed proprietary technology, business  
28 plans and financial data, and third-party business relationships, the provision of which would

1 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
2 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
3 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
4 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

5 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
6 phrase "sufficient to identify all Amelco customers that have purchased or licensed hardware or  
7 software related to the SSBT" which is susceptible to multiple interpretations and which renders  
8 this request overbroad, unduly burdensome, and unintelligible as drafted.

9 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
10 facts.

11 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
12 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
13 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
14 on information within its possession, custody, and control under FRCP 34, and does not purport  
15 to respond on behalf of any other party or non-party to this litigation.

16 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
17 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
18 of relevance to the claims in this matter.

19 6. AUSA objects to this request as seeking material falling outside the scope of  
20 discovery under FRCP 26(b).

21 7. AUSA objects to this request on grounds that it appears to seek documents or  
22 information that consist of trade secrets or other proprietary, confidential, research, development,  
23 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
24 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
25 parties.

26 8. AUSA objects to this request to the extent it seeks material protected from  
27 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
28 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA



1 does not interpret that this request seeks such material.

2 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
3 to this request.

4 **REQUEST FOR PRODUCTION NO. 58:**

5 *Documents sufficient to show the amounts paid by Amelco customers that have purchased*  
6 *or licensed hardware or software related to the SSBT.*

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

8 AUSA objects to this request as follows:

9 1. AUSA objects to this request on grounds that it appears to be propounded for no  
10 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
11 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
12 any way to gaming technology and/or AUSA's business affairs, which documents might  
13 reasonably include records regarding independently-developed proprietary technology, business  
14 plans and financial data, and third-party business relationships, the provision of which would  
15 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
16 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
17 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
18 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

19 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
20 phrase "sufficient to show the amounts paid by Amelco customers that have purchased or licensed  
21 hardware or software related to the SSBT" which is susceptible to multiple interpretations and  
22 which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

23 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
24 facts.

25 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
26 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
27 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
28 on information within its possession, custody, and control under FRCP 34, and does not purport

1 to respond on behalf of any other party or non-party to this litigation.

2 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
3 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
4 of relevance to the claims in this matter.

5 6. AUSA objects to this request as seeking material falling outside the scope of  
6 discovery under FRCP 26(b).

7 7. AUSA objects to this request on grounds that it appears to seek documents or  
8 information that consist of trade secrets or other proprietary, confidential, research, development,  
9 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
10 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
11 parties.

12 8. AUSA objects to this request to the extent it seeks material protected from  
13 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
14 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
15 does not interpret that this request seeks such material.

16 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
17 to this request.

18 **REQUEST FOR PRODUCTION NO. 59:**

19 *Documents sufficient to identify all Amelco customers that have purchased or licensed*  
20 *hardware or software related to any retail gaming or gambling kiosk or other retail gaming or*  
21 *gambling solution in the US market (other than the SSBT).*

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

23 AUSA objects to this request as follows:

24 1. AUSA objects to this request on grounds that it appears to be propounded for no  
25 purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by  
26 purporting to compel AUSA to provide an essentially limitless category of documents relating in  
27 any way to gaming technology and/or AUSA's business affairs, which documents might  
28 reasonably include records regarding independently-developed proprietary technology, business

1 plans and financial data, and third-party business relationships, the provision of which would  
2 impose an unfair and undue burden on AUSA (and on non-parties) which would substantially  
3 outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable  
4 claim to any interest in or profits of any of AUSA's technology or business dealings with third  
5 parties, and therefore the facts and circumstances of the same are utterly irrelevant.

6 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
7 phrase "sufficient to identify all Amelco customers that have purchased or licensed hardware or  
8 software related to any retail gaming or gambling kiosk or other retail gaming or gambling solution  
9 in the US market (other than the SSBT)" which is susceptible to multiple interpretations and which  
10 renders this request overbroad, unduly burdensome, and unintelligible as drafted.

11 3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes  
12 facts.

13 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
14 defined term "Amelco," which is susceptible to multiple interpretations and which renders this  
15 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
16 on information within its possession, custody, and control under FRCP 34, and does not purport  
17 to respond on behalf of any other party or non-party to this litigation.

18 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
19 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
20 of relevance to the claims in this matter.

21 6. AUSA objects to this request as seeking material falling outside the scope of  
22 discovery under FRCP 26(b).

23 7. AUSA objects to this request on grounds that it appears to seek documents or  
24 information that consist of trade secrets or other proprietary, confidential, research, development,  
25 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
26 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
27 parties.

28 8. AUSA objects to this request to the extent it seeks material protected from

disclosure by privilege or immunity, including attorney-client privilege, work product doctrine, and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks such material.

Based on the foregoing specific and general objections, AUSA has no obligation to respond to this request.

**REQUEST FOR PRODUCTION NO. 60:**

*Documents sufficient to show the amounts paid by Amelco customers that have purchased or licensed hardware or software related to any retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market (other than the SSBT).*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

AUSA objects to this request as follows:

1. AUSA objects to this request on grounds that it appears to be propounded for no purpose other than to burden, harass, and annoy AUSA, its business partners, and customers by purporting to compel AUSA to provide an essentially limitless category of documents relating in any way to gaming technology and/or AUSA's business affairs, which documents might reasonably include records regarding independently-developed proprietary technology, business plans and financial data, and third-party business relationships, the provision of which would impose an unfair and undue burden on AUSA (and on non-parties) which would substantially outweigh any likely benefit for the litigation of material issues in this case. ISI has no colorable claim to any interest in or profits of any of AUSA's technology or business dealings with third parties, and therefore the facts and circumstances of the same are utterly irrelevant.

2. AUSA objects to this request as vague and ambiguous to the extent it relies on the phrase "sufficient to show the amounts paid by Amelco customers that have purchased or licensed hardware or software related to any retail gaming or gambling kiosk or other retail gaming or gambling solution in the US market (other than the SSBT)" which is susceptible to multiple interpretations and which renders this request overbroad, unduly burdensome, and unintelligible as drafted.

3. AUSA objects to this request on grounds that it assumes and/or mischaracterizes

1 facts.

2 4. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
3 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
4 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
5 on information within its possession, custody, and control under FRCP 34, and does not purport  
6 to respond on behalf of any other party or non-party to this litigation.

7 5. AUSA objects to this request as vague, overbroad, and unduly burdensome in that  
8 it purports to compel production of a broad category of documents, unlimited in time, irrespective  
9 of relevance to the claims in this matter.

10 6. AUSA objects to this request as seeking material falling outside the scope of  
11 discovery under FRCP 26(b).

12 7. AUSA objects to this request on grounds that it appears to seek documents or  
13 information that consist of trade secrets or other proprietary, confidential, research, development,  
14 or commercial information of AUSA that is protectable from disclosure under FRCP 26(c) or other  
15 applicable law, and/or which is prohibited from disclosure by contractual obligations to third  
16 parties.

17 8. AUSA objects to this request to the extent it seeks material protected from  
18 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
19 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
20 does not interpret that this request seeks such material.

21 Based on the foregoing specific and general objections, AUSA has no obligation to respond  
22 to this request.

23 **REQUEST FOR PRODUCTION NO. 61:**

24 *All Documents or Communications exchanged between Amelco and any third party*  
25 *concerning ISI.*

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61**

27 AUSA objects to this request as follows:

28 1. AUSA objects to this request as vague and ambiguous to the extent it relies on the

1 phrase “concerning ISI,” which is susceptible to multiple interpretations and which renders this  
2 request overbroad, unduly burdensome, and unintelligible as drafted.

3 2. AUSA objects to this request as vague and ambiguous to the extent it relies on the  
4 defined term “Amelco,” which is susceptible to multiple interpretations and which renders this  
5 request unintelligible and/or overbroad. AUSA responds to this request on its own behalf based  
6 on information within its possession, custody, and control under FRCP 34, and does not purport  
7 to respond on behalf of any other party or non-party to this litigation.

8 3. AUSA objects to this request as overbroad and unduly burdensome in that it  
9 purports to compel production of a broad category of documents, unlimited in time and scope,  
10 irrespective of relevance to the claims in this matter.

11 4. AUSA objects to this request as seeking material falling outside the scope of  
12 discovery under FRCP 26(b).

13 5. AUSA objects to this request to the extent it seeks documents or information that  
14 consist of trade secrets or other proprietary, confidential, research, development, or commercial  
15 information of AUSA that is protectable from disclosure under FRCP 26(c) or other applicable  
16 law, and/or which is prohibited from disclosure by contractual obligations to third parties. For  
17 clarity, notwithstanding the foregoing objection, AUSA does not interpret that this request seeks  
18 such material.

19 6. AUSA objects to this request to the extent it seeks material protected from  
20 disclosure by privilege or immunity, including attorney-client privilege, work product doctrine,  
21 and/or the common interest privilege. For clarity, notwithstanding the foregoing objection, AUSA  
22 does not interpret that this request seeks such material.

23 Subject to, and without waiving the foregoing general and specific objections, and to the  
24 extent AUSA is able to understand this request, AUSA states that it has produced or will produce  
25 non-privileged, responsive documents in its possession, custody, or control that are relevant to the  
26 claims at issue in this case as AUSA understands them and which are proportional to the needs of  
27 the case. Discovery and AUSA’s investigation of the claims and defenses in this matter are ongoing  
28 and AUSA reserves the right to supplement or amend its response to this request as and when

appropriate.

**REQUEST FOR PRODUCTION NO. 62:**

*All Documents or Communications that Amelco intends to rely on to support any claim or defense in this matter.*

**RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

AUSA objects to this request as follows:


1. AUSA objects to this request to the extent it purports to impose a burden on AUSA to identify all pieces of evidence which might support its contentions and defenses at this stage of the case. Discovery is in its early stages and AUSA's investigation of the claims and defenses in this matter are ongoing.

2. AUSA objects to this request to the extent it purports to impose any obligation on AUSA that is different from or additional to the mandatory early case and pretrial disclosure obligations imposed under the Federal Rules of Civil Procedure.

Subject to, and without waiving, the foregoing specific and general objections, AUSA states that it has disclosed or will disclose all documents on which it intends to rely to support its claims or defenses in this matter in accordance with the mandatory early case and pretrial disclosure obligations imposed under the Federal Rules of Civil Procedure.

DATED: December 4, 2023

**FENNEMORE CRAIG, P.C.**

By:   
John D. Tennert III (Nev. Bar No. 11728)  
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*Attorneys for Amelco UK, Ltd., and Amelco  
USA LLC*

**CERTIFICATE OF SERVICE**


I hereby certify that I am an employee of FENNEMORE CRAIG, P.C., and that on this date, a true and correct copy of the foregoing **DEFENDANT AMELCO USA, LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF INTERNET SPORTS INTERNATIONAL, LTD'S AMENDED FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO AMELCO USA, LLC** was served via electronic mail, with a copy deposited for delivery via U.S. mail, to the following attorneys associated with this case:

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Dated: December 4, 2023.



Employee of Fennemore Craig, P.C.